

**REMARKS**

Claims 1-20 are pending. In this Office Action, Claims 1-20 are examined and rejected under 35 USC 103(a) as being unpatentable over Kuwahara (US Patent No.: 6,202,072, hereinafter "Kuwahara") in view of Christiano (US Patent No.: 5,386,369, hereinafter "Christiano"), and in further view of Masanori (Japanese Patent No. 41 0116275 A, hereinafter "Masanori"), claims 11 and 13 are further rejected over a further combination with Arn (PCT Application Publication No.: WO 94/14122, hereinafter "Arn").

The Examiner is appreciated for his thoughtful review and comments. In the foregoing amendments, Claim 1, 14 and 20 are amended to further distinguish from the cited references. Reconsideration of Claims 1-20 is respectfully requested in view of the following remarks.

As amended, Claim 1 recites:

- activating a counter counting a number of pages being converted in the document conversion process;
- converting an unstructured document into an output presentation in a first display, the output presentation including a number of displayable objects and respective decoration attributes about each of the displayable objects;
- receiving a definition file including document type definitions (DTD) relating to the unstructured document;
- generating a tree structure in a second display showing hierarchical relationships of document elements from the DTD;
- displaying in a second display next to the first display a DTD structure showing structures of the document elements and a tree structure showing the hierarchical relationships of the document elements based on a root element;
- associating one of the document elements in the tree structure with one of the displayable objects in the output presentation in the first display;
- generating a modified output presentation including association information of each one of the displayable objects being associated with one of the definitions in the definition file; and
- causing the counter to increment as soon as the modified output presentation is saved.

*(emphasis added)*

The features as recited are originally supported between lines 25 of page 18 to line 5 of page 19 and FIG. 3B in the Specification. In particular, when a DTD (Pool) 328 is loaded in FIG. 3B, a (XML) tree structure 330 is generated or derived from the DTD 328 and subsequently shows the hierarchical relationships of the document elements. It is important to note that the tree structure 330 as well as the DTD Pool 328 are both shown in FIG. 3B. Further the tree structure 330 is the one (not the DTD Pool 328) used to associate one of the document elements therein with one of the displayable objects in the output presentation 322.

The Examiner relied on Kuwahara, Christiano and Masanori in combination to reject Claim 1 and 14. The Applicants respectfully contest the combination of these references as it is believed that there is no motivation to combine these references in the manner proposed by the Examiner. Nevertheless, even if these references were to be combined, the combination would still fail to teach or suggest the combined features recited in the Claims 1.

The Examiner has agreed that Kuwahara does not specifically disclose "generating a tree structure in a second display ... associating one of the document elements ... with one of the displayable objects in the output presentation in the first display" (see 2<sup>nd</sup> para. on page 4 of the Office Action). Masanori is then recited to show the features. As clearly shown in FIG. 3 and FIG. 5 of Masanori, only a DTD structure 31 is shown in FIG. 3 or FIG. 5. Masanori fails to teach or suggest *"displaying in a second display next to the first display a DTD structure showing structures of the document elements and a tree structure showing the hierarchical relationships of the document elements based on a root element"*.

The Applicant wants to emphasize again that the second display (e.g., 324 of FIG. 3B) recited in Claim 1 shows two different structures, a *DTD structure* (e.g., 328 of FIG. 3B) and a *tree structure* (e.g., 330 of FIG. 3B). None of the cited references, viewed alone or in combination, have taught or suggested such features. Accordingly, it is believed that the amended Claim 1 is allowable over the cited references.

Claims 14 and 20 are also amended to include similar features that are recited in Claim 1.

In addition, the Examiner appears silent on the Applicant's previous argument on Christiano that does show the use of "dongle" to control the use of software. However, Christiano fails to specify to count an output of the software. As recited in Claim 20, a counter functions only when the structured file is saved, the counter does not count the use when the conversation is in process. In other words, a counter having a numbering system counting a number of pages being converted in the document conversion process not the document conversion process itself.

More specifically, Claim 20 may be understood to recite that three items are being displayed, the displayable objects in a first display, the document type definitions and the tree structure in the second display. With the reasons provided above, the Applicant respectfully submits the references Kuwahara, Christiano and Masonori, viewed alone or in combination, have neither taught nor suggested the features recited in the amended Claim 1, 14 and 20.

In view of the above amendments and remarks, the Applicant believes that Claims 1-20 shall be in condition for allowance over the cited references. Early and favorable action is being respectfully solicited.

If there are any issues remaining which the Examiner believes could be resolved through either a Supplementary Response or an Examiner's Amendment, the Examiner is respectfully requested to contact the undersigned at (408)777-8873.

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to "Commissioner of Patents and Trademarks, Washington, DC 20231", 03/1/2005.

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Respectfully submitted;

  
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